## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS BROWNSVILLE DIVISION

STATE OF TEXAS, et al.,	§	
	§	
Plaintiffs,	§	
,	§	
v.	§	Case No. 1:18-CV-68
	§	
UNITED STATES OF AMERICA, et al.,	§	
	§	
Defendants,	§	
	§	
and	§	
	§	
KARLA PEREZ, et al.,	§	
	§	
Defendant-	§	
Intervenors.	§	

# <u>DEFENDANT-INTERVENORS' ADVISORY TO THE COURT REGARDING</u> <u>ERRONEOUS INCLUSION OF COUNSEL ON DOCKET</u>

Defendant-Intervenors Karla Perez, *et al.*, respectfully file this Advisory to inform the Court that Ms. Mary Kelly Persyn does not represent Defendant-Intervenors and is erroneously listed as their counsel on the docket.

On July 23, 2018, Ms. Persyn moved for leave to file an amicus brief in this case on behalf of the American Professional Society on the Abuse of Children ("APSAC"). *See* Dkt. 254 at 32. In her Motion to Appear *pro hac vice*, Ms. Persyn incorrectly indicated that she represents Defendant-Intervenors Karla Perez *et al.* and the State of New Jersey. *See* Dkt. 230 at 1. On July 24, 2018, this Court granted Mary Kelly Persyn's Motion for Admission *pro hac vice. See* Dkt. 238 at 1. As a result, Ms. Persyn is currently listed as counsel of record for Defendant-Intervenors in the Court's docket sheet.

Defendant-Intervenors respectfully file this Advisory to facilitate correction of the docket

in the above-referenced case to reflect that Ms. Mary Kelly Persyn does not represent Defendant-Intervenors.

Dated: June 21, 2019 Respectfully submitted,

### MEXICAN AMERICAN LEGAL DEFENSE AND EDUCATIONAL FUND

By: /s/Nina Perales
Nina Perales (Tex. Bar No. 24005046);
(SD of Tex. Bar No. 21127)
Attorney-in-Charge
Alejandra Ávila (Tex. Bar No. 24089252)
(SD of Tex. Bar No. 2677912)
Ernest I. Herrera (Tex. Bar No. 24094718);
(SD of Tex. Bar No. 2462211)
110 Broadway, Suite 300

San Antonio, Texas 78205 Phone: (210) 224-5476 Facsimile: (210) 224-5382 Email: nperales@maldef.org

#### **ROPES & GRAY LLP**

Douglas H. Hallward-Driemeier 2099 Pennsylvania Ave NW Washington, DC 20006-6807 (202) 508-4600 (202) 508-4776 (direct dial) Douglas.Hallward-Driemeier@ropesgray.com (Admitted pro hac vice)

# GARCÍA & GARCÍA, ATTORNEYS AT LAW P.L.L.C.

Carlos Moctezuma García (Tex. Bar No. 24065265) (SD of Tex. Bar No. 1081768) P.O. Box 4545 McAllen, TX 78502

Phone: (956) 630-3889 Facsimile: (956) 630-3899

Email: cgarcia@garciagarcialaw.com

Attorneys for Proposed Defendant-Intervenors

# **CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that, on the 21st day of June, 2019, I electronically filed the above and foregoing document using the CM/ECF system, which automatically sends notice and a copy of the filing to all counsel of record.

/s/ Nina Perales
Nina Perales